

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**



FILED

10-18-06
04:36 PM

Order Instituting Rulemaking to Implement the)
Commission's Procurement Incentive)
Framework and to Examine the Integration of)
Greenhouse Gas Emission Standards into)
Procurement Policies.)
_____)

R.06-04-009
(Filed April 13, 2006)

**COMMENTS OF CALPINE CORPORATION
ON FINAL WORKSHOP REPORT ADDRESSING INTERIM EMISSIONS
PERFORMANCE STANDARD PROGRAM FRAMEWORK**

Avis Kowalewski
Director, Western Regulatory Affairs
CALPINE CORPORATION
3875 Hopyard Road, Suite 345
Pleasanton, CA 94588
Tel. (925) 479-6640
Fax. (925) 479-7303
Email: kowalewskia@calpine.com

Jeffrey P. Gray
DAVIS WRIGHT TREMAINE LLP
505 Montgomery Street, Suite 800
San Francisco, CA 94111
Tel. (415) 276-6500
Fax. (415) 276-6599
Email: jeffgray@dwt.com

Attorneys for Calpine Corporation

Dated: October 18, 2006

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the)
Commission's Procurement Incentive)
Framework and to Examine the Integration of)
Greenhouse Gas Emission Standards into)
Procurement Policies.)
_____)

R.06-04-009
(Filed April 13, 2006)

**COMMENTS OF CALPINE CORPORATION
ON FINAL WORKSHOP REPORT ADDRESSING INTERIM EMISSIONS
PERFORMANCE STANDARD PROGRAM FRAMEWORK**

Pursuant to the October 5, 2006 Assigned Commissioner's Ruling, Calpine Corporation ("Calpine") respectfully submits these comments on the final workshop report addressing Commission Staff's proposed interim emissions performance standard ("EPS") program framework ("Final Workshop Report").

As Calpine noted in its comments on the Draft Workshop Report, Calpine strongly supports the adoption of an EPS limit that will both prevent backsliding and encourage long-term commitments with lower-emitting baseload generation resources. To accomplish this goal, it is important that the Commission adopt the lowest possible EPS limit without compromising reliability. Calpine believes that an EPS limit of 1,000 lbs CO₂/MWh is consistent with Senate Bill ("SB") 1368 in that it represents a reasonable approximation of the emissions of a combined cycle natural gas turbine ("CCGT") and would not limit the availability of long-term baseload generation resources necessary to meet the State's future reliability needs.

In addition, it is critical that the EPS limit adopted by the Commission apply to *actual emissions*. Exemptions for research and development ("R&D") projects that otherwise do not

meet the EPS limit¹ and/or the use of emission proxies for “unspecified resources”² are by nature inconsistent with SB 1368 and the fundamental purpose of an EPS limit because they do not account for actual GHG emissions from the emitting resource. For this reason, the Final Workshop Report should be revised to require that all long-term commitments for baseload generation be limited to “specified resources” and that, absent a strong showing that an exception to the EPS limit is needed for reliability purposes, the emissions for all long-term baseload generation must meet the adopted EPS limit at the time of the commitment.

I. AN EPS LIMIT OF 1,000 LBS CO₂/MWh IS CONSISTENT WITH SB 1368 AND SHOULD BE ADOPTED BY THE COMMISSION

The Draft Workshop Report would have established an EPS limit applicable to all existing, repowered, and new resources of 1,000 lbs CO₂/MWh.³ As support for this position, the Draft Workshop Report reasoned that a limit of 1,000 lbs CO₂/MWh “[will] allow[] for high performing existing CCGTs to qualify and is significantly above the average emissions reported for gas plants within and outside of the state.”⁴ Although, the Draft Workshop Report found that high performing CCGTs would meet an EPS limit of 1,000 lbs CO₂/MWh, the Final Workshop Report increases the limit to 1,100 lbs.⁵ Such an increase in the EPS limit is inconsistent with the goals of SB 1368 and not necessary to ensure reliability.

The primary goal of SB 1368 is to prevent “backsliding” while the Commission and other State regulatory agencies develop and implement longer term programs to mitigate the environmental impacts associated with GHG emissions. Specifically, SB 1368, provides:

[t]he establishment of a policy to reduce emissions of greenhouse gases, including an emissions performance standard for all

¹ See Final Workshop Report at 45.

² See Final Workshop Report at 46.

³ Draft Workshop Report at 28.

⁴ Draft Workshop Report at 28; *see also* Final Workshop Report at 33.

⁵ Final Workshop Report at 34.

procurement of electricity by load-serving entities, *is a logical and necessary step to meet the goals of the Energy Action Plan II and the Governor's goals for reduction of emissions of greenhouse gases.*⁶

In Executive Order S-3-05, Governor Schwarzenegger called for a reduction in GHG emissions to 1990 levels by 2020. As Calpine has previously discussed,⁷ a key factor in whether California will be able to meet this target will be the growth of CO2 emissions in the near term. The more that CO2 emissions increase in the near-term, the more difficult it will be to meet the Governor's 2020 goal. Thus, it is critical to meeting California's longer-term environmental goals that the Commission set the interim EPS limit as *low as possible* to mitigate increases in CO2 emissions without compromising reliability.

As a practical matter, any *new* CCGT should be able to meet an EPS limit of 1,000 lbs CO2/MWh. Thus, the issue is whether the EPS limit accommodates existing CCGT resources. Indeed, according to the Final Workshop Report, the primary reason for increasing the limit to 1,100 lbs is to accommodate *existing* CCGT units.⁸ It is unnecessary, however, to adjust the EPS limit to accommodate existing resources because SB 1368 "deems" all CCGTs currently in operation or having a final permit decision from the California Energy Commission to be in compliance with the EPS limit.⁹ As a result, load serving entities ("LSEs") will continue to be able to enter into long-term baseload contracts with existing CCGTs regardless of the EPS limit adopted by the Commission.¹⁰

⁶ Chapter 598, Section 1(h), Statutes of 2006 (emphasis added).

⁷ See Comments of Calpine Corporation on Draft Workshop report Addressing Interim Emissions Performance Standard Program Framework at 3.

⁸ Final Workshop Report at 34.

⁹ Chapter 598, Section 8341(d)(1), Statutes of 2006.

¹⁰ In addition, because the interim EPS applies only to long-term commitments for baseload generation resources, LSEs will continue to be able to enter into short- and intermediate-term commitments with all types of generation resources, including high emitting resources if needed.

Given that existing CCGTs are deemed compliant with the EPS limit, an EPS limit of 1,000 lbs CO₂/MWh will allow LSEs to meet their respective reliability needs without locking themselves (and the State) into *new* long-term commitments with high-polluting resources. This approach is consistent with the goals of SB 1368 and the Governor’s long-term GHG reduction goals.

II. ALLOWING R&D EXEMPTIONS FOR RESOURCES THAT DO NOT OTHERWISE MEET THE EPS LIMIT IS INCONSISTENT WITH SB 1368 AND THE STATE’S LONG-TERM GHG REDUCTION GOALS

The Final Workshop Report proposes an R&D exemption for high emitting resources that otherwise would not meet the interim EPS limit.¹¹ According to the Final Workshop Report, one example of a resource that could qualify for the proposed R&D exemption would be:

an advanced coal facility that has an equal or better emission rate than the estimated [integrated gasification combined cycle (“IGCC”)] average heat rate and emissions, and that has or will have *in a reasonable period of time* the capacity and an existing plan to capture and store carbon dioxide¹²

Creating exemptions for resources that otherwise do not meet the EPS limit established by the Commission is inconsistent with policies aimed at reducing GHG emissions. As the Draft Workshop Report noted, the average emissions rate for an IGCC facility is 1,770 lbs CO₂/MWh. Thus, the R&D exemption proposed in the Final Workshop Report could have the effect of exempting a resource with an emission rate 60% higher than the proposed EPS limit. An EPS limit will only prevent backsliding and further California’s long-term GHG reduction goals if it is applied equally to all generation resources.

If a resource does not meet the EPS limit at the time an LSE’s commitment to the resource is proposed, the Commission should not approve a long-term commitment with that

¹¹ Final Workshop Report at 27.

¹² Final Workshop Report at 27 (emphasis added).

resource. Thus, if advanced coal technology cannot meet the interim EPS limit absent carbon sequestration, then that resource should not be eligible for a long-term commitment with an LSE unless and until the sequestration process is operable and the resource can demonstrate compliance with the interim EPS limit.

III. ALLOWING LONG-TERM COMMITMENTS WITH UNSPECIFIED RESOURCES IS NOT MANDATED BY SB 1368 AND WILL UNDERMINE THE STATE'S LONG-TERM GHG REDUCTION GOALS

The Final Workshop Report would allow long-term baseload commitments to be made with “unspecified resources” (*i.e.*, contracts that are not unit specific). In such cases, the Final Workshop Report proposes applying a proxy emissions level for purposes of determining compliance with the EPS limit.¹³ The proxy would be based on the California Energy Commission’s “Net System Power” average.¹⁴ The Final Workshop Report contends that the use of a proxy for unspecified resources is justified because “long-term contracts with unspecified resources are a small fraction of the incremental power supply.”¹⁵

The use of proxies for purposes of determining compliance with the EPS undermines GHG reduction goals because, by definition, such proxies do not reflect the actual emissions from a resource.¹⁶ As a result, there is no way to determine whether a commitment with an unspecified resource is consistent with the Commission’s goals in this proceeding or simply exacerbates the problems the Commission and the State are trying to address. Moreover (*and perhaps most importantly*), although long-term commitments with unspecified resources may currently make-up only a small fraction of the incremental power supply, the use of a proxy that would assign a lower emissions level to a resource could encourage long-term commitments with

¹³ See Final Workshop Report at 31, 38, and 46.

¹⁴ Final Workshop Report at 38.

¹⁵ Final Workshop Report at 38.

¹⁶ It is axiomatic that the emissions from a resource can only be measured if the identity of the resource is known.

resources that would otherwise not meet the interim EPS limit. For instance, if a proxy guarantees EPS compliance, there would be no reason why any resource would not pass the EPS screen because non-compliant resources would always use the emissions proxy. The net effect is that long-term commitments with higher emitting resources may ultimately increase.

Policies that potentially increase long-term commitments with high emitting resources should be discouraged. Accordingly, the Final Workshop Report should be revised to require that all long-term commitments for baseload generation involve “specified resources” that can demonstrate compliance with the interim EPS.

IV. CONCLUSION

For the reasons discussed herein and in Calpine previously filed comments, Calpine recommends that the Commission (1) adopt 1,000 lbs CO₂/MWh at the EPS limit; (2) require that all long-term commitments for baseload generation involve “specified resources” that can demonstrate compliance with the EPS limit; and (3) prohibit exemptions for resources that cannot meet the EPS limit, except in the limited case where a strong showing is made that a non-compliant resource is necessary for reliability purposes.

Respectfully submitted,

/s/ Jeffrey P. Gray

Jeffrey P. Gray
DAVIS WRIGHT TREMAINE LLP,
505 Montgomery Street, Suite 800
San Francisco, California 94111
Tel. (415) 276-6500
Fax. (415) 276-6599
Email: jeffgray@dwt.com

Attorneys for Calpine Corporation

Avis Kowalewski
Director, Western Regulatory Affairs
CALPINE CORPORATION
3875 Hopyard Road, Suite 345
Pleasanton, CA 94588
Tel. (925) 479-6640
Fax. (925) 479-7303
Email: kowalewskia@calpine.com

Dated: October 18, 2006

CERTIFICATE OF SERVICE

I, Judy Pau, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 505 Montgomery Street, Suite 800, San Francisco, California 94111.

On October 18, 2006, I caused the following to be served:

COMMENTS OF CALPINE CORPORATION ON FINAL WORKSHOP REPORT ADDRESSING INTERIM EMISSIONS PERFORMANCE STANDARD PROGRAM FRAMEWORK

via electronic mail to all parties on the service list R.06-04-009 who have provided the Commission with an electronic mail address and by First class mail on the parties listed as "Appearance" and "State Service" on the attached service list who have not provided an electronic mail address.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on the date above at San Francisco, California.

/s/ Judy Pau

Judy Pau

VIA HAND DELIVERY AND EMAIL

President Michael Peevey
ALJ Charlotte Terkeurst
ALJ Meg Gottstein
ALJ Jonathan Lakritz

VIA E-MAIL

adrian.pye@na.centrica.com; rick_noger@praxair.com; keith.mccrea@sablauw.com;
kevin.boudreaux@calpine.com; ej_wright@oxy.com; eguidry@westernresources.org;
ibbarrett@adelphia.net; don.stoneberger@apses.com; Gwilliams@SPPC.COM;
gregory.koiser@constellation.com; mmazur@3phases.com; tiffany.rau@bp.com;

klatt@energyattorney.com; douglass@energyattorney.com; pssed@adelphia.net;
akbar.jazayeri@sce.com; annette.gilliam@sce.com; rkmoore@gswater.com;
amsmith@sempra.com; amsmith@sempra.com; svongdeuane@semprasolutions.com;
troberts@sempra.com; Bill.Lyons@shell.com; tdarton@pilotpowergroup.com;
lschavrien@semprautilities.com; GloriaB@anzaelectric.org; llund@commerceenergy.com;
george.hanson@ci.corona.ca.us; thunt@cecmil.org; llorenz@semprautilities.com;
dil@cpuc.ca.gov; fjs@cpuc.ca.gov; achang@nrdc.org; ek@a-klaw.com; mpa@a-klaw.com;
sls@a-klaw.com; cjlw5@pge.com; epoole@adplaw.com; bcragg@gmssr.com;
jsqueri@gmssr.com; jkarp@winston.com; kbowen@winston.com; lcottle@winston.com; Gray,
Jeffrey; lars@resource-solutions.org; bkc7@pge.com; aweller@sel.com; jchamberlin@sel.com;
kerry.hattevik@mirant.com; kowalewskia@calpine.com; bill.chen@constellation.com;
hoerner@redefiningprogress.org; janill.richards@doj.ca.gov; cchen@ucsusa.org;
gmorris@emf.net; tomb@crossborderenergy.com; bmcc@mccarthyllaw.com;
jjensen@kirkwood.com; mary.lynch@constellation.com; abb@eslawfirm.com;
glw@eslawfirm.com; jjg@eslawfirm.com; dansvec@hdo.net; marshall@psln.com; deb@a-
klaw.com; kyle.l.davis@pacificorp.com; Natalie.Hocken@PacifiCorp.com;
shayleah.labray@pacificorp.com; kelly.norwood@avistacorp.com; carter@ieta.org;
cajollyco@verizon.net; bjones@mjbroadley.com; rapcowart@aol.com; burtraw@rff.org;
vb@pointcarbon.com; lisa.decker@constellation.com; cswollums@midamerican.com;
bhpotts@michaelbest.com; jimross@r-c-s-inc.com; pseby@mckennalong.com;
todil@mckennalong.com; kjsimonsen@ems-ca.com; kelly.potter@apses.com;
bmcquown@reliant.com; ckmitche11@sbcglobal.net; fluchetti@ndep.nv.gov;
rprince@semprautilities.com; curtis.kebler@gs.com; mike@climaterestry.org;
harveyederpspc.org@hotmail.com; roger.pelote@williams.com; case.admin@sce.com;
bjl@bry.com; asullivan@sempra.com; liddell@energyattorney.com; ygross@sempraglobal.com;
jlaun@apogee.net; jleslie@luce.com; pepper@cleanpowermarkets.com;
gsmith@adamsbroadwell.com; mdjoseph@adamsbroadwell.com; diane_fellman@fpl.com;
hayley@turn.org; marcel@turn.org; freedman@turn.org; mflorio@turn.org; nsuetake@turn.org;
Dan.adler@calcef.org; dwang@nrdc.org; filings@a-klaw.com; obystrom@cera.com;
scarter@nrdc.org; S1L7@pge.com; norman.furuta@navy.mil; cem@newsdata.com;
agrimaldi@mckennalong.com; hgo1ub@nixonpeabody.com; jscancarelli@flk.com;
jwiedman@gmssr.com; mmattes@nossaman.com; Hilen, Chris; jen@cnt.org;
lisa_weinzimer@platts.com; steven@moss.net; ssmyers@att.net; sellis@fypower.org;
d1ct@pge.com; el15@pge.com; gxl2@pge.com; jxa2@pge.com; JDF1@PGE.COM;
sscb@pge.com; sv56@pge.com; vjlw3@pge.com; greg.blue@sbcglobal.net;
andy.vanhorn@vhcenergy.com; sshleimer@calpine.com; mrw@mrwassoc.com;
cpeterman@berkeley.edu; rschmidt@bartlewells.com; jgalloway@ucsusa.org;
clyde.murley@comcast.net; elvine@lbl.gov; rhwiser@lbl.gov; arno@arnoharris.com;
philm@scedenergy.com; cpechman@powereconomics.com; kswain@powereconomics.com;
emahlon@ecoact.org; ewanless@nrdc.org; sberlin@mccarthyllaw.com; joyw@mid.org;
richards@mid.org; chrism@mid.org; rogerv@mid.org; clark.bernier@rlw.com;
rmccann@umich.edu; cmkehrein@ems-ca.com; e-recipient@caiso.com;
saeed.farrokhpay@ferc.gov; david@branchcomb.com; scott.tomashefsky@ncpa.com;
ewolfe@resero.com; ahartmann@lspower.com; mclaughlin@braunlegal.com;
curt.barry@iwpnews.com; steven@iepa.com; etiedemann@kmtg.com; bpurewal@water.ca.gov;
kmills@cbbf.com; karen@klindh.com; Denise_Hill@transalta.com; ktfox@stoel.com; sas@a-
klaw.com; alan.comnes@nrgenergy.com; mtrexler@climateservices.com;
samuel.r.sadler@state.or.us; lisa.c.schwartz@state.or.us; jesus.arredondo@nrgenergy.com;
tim.hemig@nrgenergy.com; karen.mcdonald@powerex.com; loe@cpuc.ca.gov;

cft@cpuc.ca.gov; tam@cpuc.ca.gov; dsh@cpuc.ca.gov; jm3@cpuc.ca.gov; jol@cpuc.ca.gov;
jci@cpuc.ca.gov; jf2@cpuc.ca.gov; krd@cpuc.ca.gov; lrm@cpuc.ca.gov; mjd@cpuc.ca.gov;
meg@cpuc.ca.gov; mts@cpuc.ca.gov; ner@cpuc.ca.gov; tex@cpuc.ca.gov;
ken.alex@doj.ca.gov; grosenblum@caiso.com; mscheibl@arb.ca.gov; gottstein@volcano.net;
bblevins@energy.state.ca.us; dks@cpuc.ca.gov; kgriffin@energy.state.ca.us;
ldecarlo@energy.state.ca.us; pduvair@energy.state.ca.us

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: R0604009 - CPUC - PG&E, SDG&E,
Filer: CPUC - PG&E, SDG&E, SOCALGAS, EDISON
List Name: LIST
Last changed: October 17, 2006

Appearance

ADRIAN PYE
ENERGY AMERICA, LLC
ONE STAMFORD PLAZA, EIGHTH FLOOR
263 TRESSER BLVD.
STAMFORD, CT 06901

RICK C. NOGER
PRAXAIR PLAINFIELD, INC.
2711 CENTERVILLE ROAD, SUITE 400
WILMINGTON, DE 19808

KEITH R. MCCREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN, LLP
1275 PENNSYLVANIA AVE., N.W. STE. 800
WASHINGTON, DC 20004-2415

KEVIN BOUDREAUX
CALPINE POWER AMERICA-CA, LLC
717 TEXAS AVENUE, SUITE 1000
HOUSTON, TX 77002

E.J. WRIGHT
OCCIDENTAL POWER SERVICES, INC.
5 GREENWAY PLAZA, SUITE 110
HOUSTON, TX 77046

ERIC GUIDRY
WESTERN RESOURCE ADVOCATES
2260 BASELINE ROAD, SUITE 200
BOULDER, CO 80304

LARRY BARRETT
AOL UTILITY CORP.
PO BOX 60429
COLORADO SPRINGS, CO 80960

DON STONEBERGER
APS ENERGY SERVICES COMPANY, INC.
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85004

DARRELL SOYARS
MANAGER-RESOURCE PERMITTING&STRATEGIC
SIERRA PACIFIC RESOURCES
6100 NEIL ROAD
RENO, NV 89520-0024

GREGORY KOISER
CONSTELLATION NEW ENERGY, INC.
350 SOUTH GRAND AVENUE, SUITE 3800
LOS ANGELES, CA 90071

MICHAEL MAZUR
3 PHASES ENERGY SERVICES
2100 SEPULVEDA BLVD., SUITE 15
MANHATTAN BEACH, CA 90266

TIFFANY RAU
POLICY AND COMMUNICATIONS MANAGER
CARSON HYDROGEN POWER PROJECT LLC
ONE WORLD TRADE CENTER, SUITE 1600
LONG BEACH, CA 90831-1600

GREGORY S.G. KLATT
DOUGLASS & LIDDELL
411 E. HUNTINGTON DRIVE, STE. 107-356
ARCADIA, CA 91006

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367

PAUL DELANEY
AMERICAN UTILITY NETWORK (A.U.N.)
10705 DEER CANYON DRIVE
ALTA LOMA, CA 91737

AKBAR JAZAYEIRI
DIRECTOR OF REVENUE & TARRIFFS
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. ROOM 390
ROSEMEAD, CA 91770

ANNETTE GILLIAM
ATTORNEY AT LAW
ELECTRIC
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY

630 EAST FOOTHILL BOULEVARD
SAN DIMAS, CA 91773

AIMEE M. SMITH
ATTORNEY AT LAW
SEMPRA ENERGY
101 ASH STREET HQ13
SAN DIEGO, CA 92101

AIMEE M. SMITH
ATTORNEY AT LAW
SEMPRA ENERGY
101 ASH STREET HQ13
SAN DIEGO, CA 92101

SYMONE VONGDEUANE
SEMPRA ENERGY SOLUTIONS
101 ASH STREET, HQ09
SAN DIEGO, CA 92101-3017

THEODORE ROBERTS
ATTORNEY AT LAW
SEMPRA GLOBAL
101 ASH STREET, HQ 13D
SAN DIEGO, CA 92101-3017

BILL LYONS
CORAL POWER, LLC
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA 92121

THOMAS DARTON
PILOT POWER GROUP, INC.
9320 CHESAPEAKE DRIVE, SUITE 112
SAN DIEGO, CA 92123

STEVE RAHON
DIRECTOR, TARIFF & REGULATORY ACCOUNTS
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32C
SAN DIEGO, CA 92123-1548

GLORIA BRITTON
ANZA ELECTRIC COOPERATIVE, INC.
58470 HWY 371
PO BOX 391909
ANZA, CA 92539

LYNELLE LUND
COMMERCE ENERGY, INC.
600 ANTON BLVD., SUITE 2000
COSTA MESA, CA 92626

GEORGE HANSON
DEPARTMENT OF WATER AND POWER
CITY OF CORONA
730 CORPORATION YARD WAY
CORONA, CA 92880

TAMLYN M. HUNT
ENERGY PROGRAM DIRECTOR
COMMUNITY ENVIRONMENTAL COUNCIL
26 W. ANAPAMU ST., 2/F
SANTA BARBARA, CA 93101

LAD LORENZ
V.P. REGULATORY AFFAIRS
SOUTHERN CALIFORNIA GAS COMPANY
601 VAN NESS AVENUE, SUITE 2060
SAN FRANCISCO, CA 94102

DIANA L. LEE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

F. JACKSON STODDARD
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5040
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

AUDREY CHANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104

MICHAEL P. ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104

SEEMA SRINIVASAN
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104

CHRISTOPHER J. WARNER
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105

EDWARD G POOLE
ANDERSON DONOVAN & POOLE
601 CALIFORNIA STREET SUITE 1300
SAN FRANCISCO, CA 94108

BRIAN T. CRAGG
ATTORNEY AT LAW
GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY
DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

JAMES D. SQUERI
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE &
DAY LLP
505 SANSOME STREET, STE 900
SAN FRANCISCO, CA 94111

JOSEPH M. KARP
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET
SAN FRANCISCO, CA 94111

KAREN BOWEN
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET
SAN FRANCISCO, CA 94111

LISA A. COTTLE
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET, 39TH FLOOR
SAN FRANCISCO, CA 94111

JEFFREY P. GRAY
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

LARS KVALE
CENTER FOR RESOURCE SOLUTIONS
PRESIDIO BUILDING 97
PO BOX 39512
SAN FRANCISCO, CA 94129

BRIAN K. CHERRY
DIRECTOR REGULATORY RELATIONS
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MC B10C
SAN FRANCISCO, CA 94177-0001

ANDREA WELLER
STRATEGIC ENERGY
3130 D BALFOUR RD., SUITE 290
BRENTWOOD, CA 94513

JENNIFER CHAMBERLIN
STRATEGIC ENERGY, LLC
3130 D BALFOUR ROAD, STE 290
BRENTWOOD, CA 94513

KERRY HATTEVIK
MIRANT CORPORATION
696 WEST 10TH STREET
PITTSBURG, CA 94565

AVIS KOWALEWSKI
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588

WILLIAM H. CHEN
CONSTELLATION NEW ENERGY, INC.
2175 N. CALIFORNIA BLVD., SUITE 300
WALNUT CREEK, CA 94596

J. ANDREW HOERNER
REDEFINING PROGRESS
1904 FRANKLIN STREET
OAKLAND, CA 94612

JANILL RICHARDS
DEPUTY ATTORNEY GENERAL
CALIFORNIA ATTORNEY GENERAL'S OFFICE
1515 CLAY STREET, 20TH FLOOR
OAKLAND, CA 94702

CLIFF CHEN
UNION OF CONCERNED SCIENTIST
2397 SHATTUCK AVENUE, STE 203
BERKELEY, CA 94704

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVENUE, STE 402
BERKELEY, CA 94704

R. THOMAS BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710

BARRY F. MCCARTHY
ATTORNEY AT LAW
MCCARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113

JOHN JENSEN
PRESIDENT
MOUNTAIN UTILITIES
PO BOX 205
KIRKWOOD, CA 95646

MARY LYNCH
CONSTELLATION ENERGY COMMODITIES GROUP
2377 GOLD MEADOW WAY, STE. 100
GOLD RIVER, CA 95670

ANDREW BROWN
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814

GREGGORY L. WHEATLAND
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814

JEDEDIAH J. GIBSON
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95814

DAN SILVERIA
SURPRISE VALLEY ELECTRIC COOPERATIVE
PO BOX 691
ALTURAS, CA 96101

ROBERT W. MARSHALL
GENERAL MANAGER
PLUMAS-SIERRA RURAL ELECTRIC CO-OP
73233 STATE ROUTE 70, STE A
PORTOLA, CA 96122-7064

DONALD BROOKHYSER
ALCANTAR & KAHL
1300 SW FIFTH AVE., SUITE 1750
PORTLAND, OR 97210

KYLE L. DAVIS
PACIFICORP
825 NE MULTNOMAH,
PORTLAND, OR 97232

NATALIE HOCKEN, ESQ.
PACIFICORP
LLOYD CENTER TOWER
825 NE MULTNOMAH
PORTLAND, OR 97232

SHAY LABRAY
MANAGER, REGULATORY
PACIFICORP
825 NE MULTNOMAH, SUITE 2000
PORTLAND, OR 97232

KELLY NORWOOD
RATES AND REGULATION DEPARTMENT
AVISTA UTILITIES
ASSN.
PO BOX 3727, MSC-29
SPOKANE, WA 99220-3727

IAN CARTER
POLICY COORDINATOR-NORTH AMERICA
INTERNATIONAL EMISSIONS TRADING
350 SPARKS STREET, STE. 809
OTTAWA, ON K1R 7S8
CANADA

Information Only

CAROL JOLLY
PO BOX 585
CHESTERFIELD, MA 01012

BRIAN M. JONES
M. J. BRADLEY & ASSOCIATES, INC.
47 JUNCTION SQUARE DRIVE
CONCORD, MA 01742

RICHARD COWART
REGULATORY ASSISTANCE PROJECT
50 STATE STREET, SUITE 3
MONTPELIER, VT 05602

DALLAS BURTRAW
1616 P STREET, NW
WASHINGTON, DC 20036

VERONIQUE BUGNION
POINT CARBON
205 SEVERN RIVER RD
SEVERNA PARK, MD 21146

LISA DECKER
COUNSEL
CONSTELLATION ENERGY GROUP, INC.
111 MARKET PLACE, SUITE 500
BALTIMORE, MD 21202

CATHY S. WOOLLUMS
MIDAMERICAN ENERGY HOLDINGS COMPANY
106 EAST SECOND STREET
DAVENPORT, IA 52801

BRIAN POTTS
SUITE 700
ONE SOUTH PINCKNEY STREET
MADISON, WI 53703

JAMES ROSS
RCS, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017

PAUL M. SEBY
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE STREET, SUITE 200
DENVER, CO 80202

TIMOTHY R. ODIL
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE STREET, SUITE 200
DENVER, CO 80202

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVENUE
DURANGO, CO 81301

KELLY POTTER
APS ENERGY SERVICES COMPANY, INC.
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85260

BRIAN MCQUOWN
RELIANT ENERGY
7251 AMIGO ST., SUITE 120
LAS VEGAS, NV 89119

CYNTHIA MITCHELL
ENERGY ECONOMICS, INC.
PROTECTION
530 COLGATE COURT
RENO, NV 89503

FRANK LUCHETTI
NEVADA DIV. OF ENVIRONMENTAL

901 S. STEWART ST., SUITE 4001
CARSON CITY, NV 89701

RASHA PRINCE
SAN DIEGO GAS & ELECTRIC
555 WEST 5TH STREET, GT14D6
LOS ANGELES, CA 90013

CURTIS L. KEBLER
GOLDMAN, SACHS & CO.
2121 AVENUE OF THE STARS
LOS ANGELES, CA 90067

MICHAEL MCCORMICK
CALIFORNIA CLIMATE ACTION REGISTRY
515 S. FLOWER ST. SUITE 1640
LOS ANGELES, CA 90071

HARVEY EDER
PUBLIC SOLAR POWER COALITION
1218 12TH ST., 25
SANTA MONICA, CA 90401

ROGER PELOTE
THE WILLIAMS COMPANY, INC.
12736 CALIFA STREET
VALLEY VILLAGE, CA 91607

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE., RM. 370
ROSEMEAD, CA 91770

BARRY LOVELL
15708 POMERADO RD., SUITE 203
POWAY, CA 92064

ADRIAN E. SULLIVAN
SEMPRA ENERGY
REGULATORY LAW DEPARTMENT
101 ASH STREET, HQ13D
SAN DIEGO, CA 92101

DONALD C. LIDDELL, P.C.
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103

YVONNE GROSS
REGULATORY POLICY MANAGER
SEMPRA ENERGY
HQ08C
101 ASH STREET
SAN DIEGO, CA 92103

JOHN LAUN
APOGEE INTERACTIVE, INC.
1220 ROSECRANS ST., SUITE 308
LLP
SAN DIEGO, CA 92106

JOHN W. LESLIE
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS,

11988 EL CAMINO REAL, SUITE 200
SAN DIEGO, CA 92130

JAN PEPPER
CLEAN POWER MARKETS, INC.
PO BOX 3206
418 BENVENUE AVENUE
LOS ALTOS, CA 94024

GLORIA D. SMITH
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., SUITE 1000
SOUTH SAN FRANCISCO, CA 94080

MARC D. JOSEPH
ADAMS BRADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD. STE 1000
SOUTH SAN FRANCISCO, CA 94080

DIANE I. FELLMAN
ATTORNEY AT LAW
LAW OFFICES OF DIANE I. FELLMAN
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

HAYLEY GOODSON
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

MARCEL HAWIGER
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

MATTHEW FREEDMAN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

MICHEL FLORIO
ATTORNEYS AT LAW
711 VAN NESS AVE., STE. 350
SAN FRANCISCO, CA 94102

NINA SUETAKE
ATTORNEY AT LAW
DEVELOPMENT
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., STE 350
SAN FRANCISCO, CA 94102

DAN ADLER
DIRECTOR, TECH AND POLICY
CALIFORNIA CLEAN ENERGY FUND
582 MARKET ST., SUITE 1015
SAN FRANCISCO, CA 94104

DEVRA WANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104

OLOF BYSTROM
DIRECTOR, WESTERN ENERGY
CAMBRIDGE ENERGY RESEARCH ASSOCIATES
555 CALIFORNIA STREET, 3RD FLOOR
SAN FRANCISCO, CA 94104

SHERYL CARTER
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

STEPHANIE LA SHAWN
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B9A
1021A
77 BEALE STREET, RM. 996B
SAN FRANCISCO, CA 94105

NORMAN J. FURUTA
FEDERAL EXECUTIVE AGENCIES
333 MARKET STREET, 10TH FLOOR, MS
SAN FRANCISCO, CA 94105-2195

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVENUE
SAN FRANCISCO, CA 94110

ANN G. GRIMALDI
MCKENNA LONG & ALDRIDGE LLP
101 CALIFORNIA STREET, 41ST FLOOR
SAN FRANCISCO, CA 94111

HOWARD V. GOLUB
NIXON PEABODY LLP
2 EMBARCADERO CENTER, STE. 2700
SAN FRANCISCO, CA 94111

JANINE L. SCANCARELLI
FOLGER LEVIN & KAHN LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111

JOSEPH F. WIEDMAN
ATTORNEY AT LAW
LLP
GOODIN MACBRIDE SQUERI RITCHIE & DAY, LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

MARTIN A. MATTES
NOSSAMAN, GUTHNER, KNOX & ELLIOTT,
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO, CA 94111

CHRISTOPHER A. HILEN
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

JEN MCGRAW
CENTER FOR NEIGHBORHOOD TECHNOLOGY
PO BOX 14322
SAN FRANCISCO, CA 94114

LISA WEINZIMER
CALIFORNIA ENERGY REPORTER
PLATTS
695 NINTH AVENUE, NO. 2
SAN FRANCISCO, CA 94118

STEVEN MOSS
SAN FRANCISCO COMMUNITY POWER COOP
2325 3RD STREET, SUITE 344
SAN FRANCISCO, CA 94120

SARA STECK MYERS
ATTORNEY AT LAW
122 28TH AVENUE
SAN FRANCISCO, CA 94121

SHAUN ELLIS
2183 UNION STREET
SAN FRANCISCO, CA 94123

DAREN CHAN
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177

ED LUCHA
PROJECT COORDINATOR
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE: B9A
SAN FRANCISCO, CA 94177

GRACE LIVINGSTON-NUNLEY
ASSISTANT PROJECT MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177

JASMIN ANSAR
PG&E
MAIL CODE B24A
PO BOX 770000
SAN FRANCISCO, CA 94177

JONATHAN FORRESTER
PG&E
MAIL CODE N13C
PO BOX 770000
SAN FRANCISCO, CA 94177

SEBASTIEN CSAPO
PROJECT MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B9A
PO BOX 770000
SAN FRANCISCO, CA 94177

SOUMYA SASTRY
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B9A
PO BOX 770000
SAN FRANCISCO, CA 94177

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, B9A
SAN FRANCISCO, CA 94177-0001

GREG BLUE
140 MOUNTAIN PKWY.
CLAYTON, CA 94517

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT
ORINDA, CA 94563

STEVEN S. SCHLEIMER
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588

MRW & ASSOCIATES, INC.
1999 HARRISON STREET, SUITE 1440
OAKLAND, CA 94612

CARLA PETERMAN
1815 BLAKE ST., APT. A
BERKELEY, CA 94703

REED V. SCHMIDT
VICE PRESIDENT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
BERKELEY, CA 94703

JOHN GALLOWAY
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY, CA 94704

CLYDE MURLEY
CONSULTANT
600 SAN CARLOS AVENUE
ALBANY, CA 94706

EDWARD VINE
LAWRENCE BERKELEY NATIONAL LABORATORY
BUILDING 90-4000
BERKELEY, CA 94720

RYAN WISER
BERKELEY LAB
MS-90-4000
ONE CYCLOTRON ROAD
BERKELEY, CA 94720

ARNO HARRIS
PO BOX 6903
SAN RAFAEL, CA 94903

PHILLIP J. MULLER
SCD ENERGY SOLUTIONS
436 NOVA ALBION WAY
SAN RAFAEL, CA 94903

CARL PECHMAN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060

KENNY SWAIN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060

MAHLON ALDRIDGE
ECOLOGY ACTION
PO BOX 1188
SANTA CRUZ, CA 95060

ERIC WANLESS
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 95104

C. SUSIE BERLIN
ATTORNEY AT LAW
MC CARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113

JOY A. WARREN
ATTORNEY AT LAW
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352

RICHARD SMITH
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95352-4060

CHRISTOPHER J. MAYER
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

ROGER VANHOY
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

CLARK BERNIER
RLW ANALYTICS
1055 BROADWAY, SUITE G
SONOMA, CA 95476

RICHARD MCCANN, PH.D
M. CUBED
2655 PORTAGE BAY, SUITE 3
DAVIS, CA 95616

CAROLYN M. KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON, CA 95620-4208

CALIFORNIA ISO
COMMISSION
LEGAL AND REGULATORY DEPARTMENT
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

SAEED FARROKHPAY
FEDERAL ENERGY REGULATORY
110 BLUE RAVINE RD., SUITE 107
FOLSOM, CA 95630

DAVID BRANCHCOMB
BRANCHCOMB ASSOCIATES, LLC
9360 OAKTREE LANE
ORANGEVILLE, CA 95662

SCOTT TOMASHEFSKY
NORTHERN CALIFORNIA POWER AGENCY
180 CIRBY WAY
ROSEVILLE, CA 95678-6420

ELLEN WOLFE
RESERO CONSULTING
9289 SHADOW BROOK PL.
GRANITE BAY, CA 95746

AUDRA HARTMANN
LS POWER GENERATION
980 NINTH STREET, SUITE 1420
SACRAMENTO, CA 95814

BRUCE MCLAUGHLIN
BRAUN & BLAISING, P.C.
915 L STREET, SUITE 1420
SACRAMENTO, CA 95814

CURT BARRY
717 K STREET, SUITE 503
SACRAMENTO, CA 95814

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSN
1215 K STREET, SUITE 900
GIRARD
SACRAMENTO, CA 95814-3947

EDWARD J. TIEDEMANN
ATTORNEY AT LAW
KRONICK, MOSKOVITZ, TIEDEMANN &
400 CAPITOL MALL, 27TH FLOOR
SACRAMENTO, CA 95814-4416

BALWANT S. PUREWAL
DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE., LL-90
SACRAMENTO, CA 95821

KAREN NORENE MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB119
ANTELOPE, CA 95843

DENISE HILL
DIRECTOR
4004 KRUSE WAY PLACE, SUITE 150
LAKE OSWEGO, OR 97035

KEVIN FOX
STOEL RIVES LLP
900 SW FIFTH AVENUE, SUITE 2600
PORTLAND, OR 97204

ANNIE STANGE
ALCANTAR & KAHL
1300 SW FIFTH AVE., SUITE 1750
PORTLAND, OR 97210

ALAN COMNES
WEST COAST POWER
INC.
3934 SE ASH STREET
PORTLAND, OR 97214

MARK C. TREXLER
TREXLER CLIMATE+ENERGY SERVICES,
529 SE GRAND AVE, M SUITE 300
PORTLAND, OR 97214-2232

SAM SADLER
OREGON DEPARTMENT OF ENERGY
625 NE MARION STREET
SALEM, OR 97301-3737

LISA SCHWARTZ
SENIOR ANALYST
OREGON PUBLIC UTILITY COMMISSION
PO BOX 2148
SALEM, OR 97308-2148

JESUS ARREDONDO
NRG ENERGY INC.
4600 CARLSBAD BLVD.
CARLSBAD, CA 9208

TIM HEMIG
DIRECTOR
NRG ENERGY
4600 CARLSBAD BLVD.
CARLSBAD, CA 9208

KAREN MCDONALD
POWEREX CORPORATION
1400,
666 BURRAND STREET
VANCOUVER, BC V6C 2X8
CANADA

State Service

JAMES LOEWEN
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
JUDGES
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

CHARLOTTE TERKEURST
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW
ROOM 5117
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHRISTINE S. TAM
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DONALD R. SMITH
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JACLYN MARKS
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
JUDGES
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JONATHAN LAKRITZ
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW
ROOM 5020
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JUDITH IKLE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
ROOM 4012
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE A. FITCH
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
ROOM 5203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KRISTIN RALFF DOUGLAS
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LAINIE MOTAMEDI
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MATTHEW DEAL
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
JUDGES
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MEG GOTTSTEIN
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW
ROOM 2106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MERIDETH STERKEL
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NANCY RYAN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5217
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

THERESA CHO
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
JUSTICE
ROOM 5207
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BILL LOCKYER
STATE ATTORNEY GENERAL
STATE OF CALIFORNIA, DEPT OF
PO BOX 944255
SACRAMENTO, CA 94244-2550

GRANT A. ROSENBLUM
STAFF COUNSEL
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

MICHAEL SCHEIBLE
DEPUTY EXECUTIVE OFFICER
CALIFORNIA AIR RESOURCES BOARD
1001 I STREET
SACRAMENTO, CA 95677

MEG GOTTSTEIN
ADMINISTRATIVE LAW JUDGE
PO BOX 210/21496 NATIONAL STREET
VOLCANO, CA 95689

B. B. BLEVINS
EXECUTIVE DIRECTOR
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-39
SACRAMENTO, CA 95814

DON SCHULTZ
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

KAREN GRIFFIN
EXECUTIVE OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 39
SACRAMENTO, CA 95814

LISA DECARLO
STAFF COUNSEL
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET MS-14
SACRAMENTO, CA 95814

PIERRE H. DUVAIR
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-41
SACRAMENTO, CA 95814